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*Counsel for Proposed Intervenor*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

**JANINE CHANDLER, et al.,**

Plaintiffs,

**v.**

**CALIFORNIA DEP'T OF CORRECTIONS  
AND REHABILITATION, et al.,**

Defendants.

Case No. 1:21-cv-01657-JLT-HBK

**JOINT STIPULATION TO EXTEND  
BRIEFING SCHEDULE AND ORDER**

Date:

Time:

Courtroom:

Judge: The Honorable Helena M.  
Barch-Kuchta

Trial Date:

Action Filed: November 17, 2021

Defendants California Department of Corrections and Rehabilitation, Kathleen Allison,  
Mona Houston, and Michael Pallares together with Plaintiffs Janine Chandler, Krystal Gonzalez,  
Tomiekia Johnson, Nadia Romero, and Woman II Woman by and through their respective

counsel of record, and subject to the approval of the Court, hereby enter into the following Stipulation:

WHEREAS, Plaintiffs filed their Complaint For Declaratory and Injunctive Relief on November 17, 2021.

WHEREAS, Defendants filed a Motion to Dismiss Complaint Pursuant to Federal Rules of Civil Procedure 12(B)(1) And 12(B)(6) (the “Motion to Dismiss”) on April 11, 2022.

WHEREAS, pursuant to this Court’s Local Rules, any opposition to Defendants’ Motion to Dismiss is due on April 25, 2022.

WHEREAS, counsel for four individuals and one organization (“Proposed Intervenors”) have alerted counsel for Plaintiffs and Defendants of (1) their clients’ intent to move to intervene in the above-captioned action and (2) their clients’ desire to file a brief in support of the Motion to Dismiss.

WHEREAS, Proposed Intervenors met with counsel for Plaintiffs on April 15, 2022, and counsel for Plaintiffs indicated they would not oppose a motion to intervene by Proposed Intervenors.

WHEREAS, due to preexisting commitments and conflicts, counsel for Defendants cannot meet and confer with Proposed Intervenors until April 28, 2022 at the earliest, which is later than any opposition to the Motion to Dismiss would currently be due.

WHEREAS, to allow time for Proposed Intervenors to meet and confer with Defendants, file their motion to intervene, and file a brief in support of Defendants’ Motion to Dismiss before any opposition is due, the parties together with Proposed Intervenors propose the following modified briefing schedule:

Event	Date
Deadline for Proposed Intervenors and Defendants to Meet and Confer	May 2, 2022

Deadline for Proposed Intervenors to File Motion to Intervene	<b>May 9, 2022</b>
Deadline for Proposed Intervenors' Brief in Support of Defendants' Motion to Dismiss	<b>May 16, 2022</b>
Deadline for Plaintiffs' Opposition to Defendants' Motion to Dismiss	<b>May 31, 2022</b>
Deadline for Replies	<b>June 10, 2022</b>

NOW, THEREFORE, IN CONSIDERATION OF THE FOREGOING, the parties together with counsel for Proposed Intervenors hereby stipulate and agree, subject to the approval of the Court, to adopt the briefing schedule proposed herein. This stipulation may be executed in counterparts.

**SO STIPULATED.**

Dated: April 20, 2022

STATE OF CALIFORNIA DEPARTMENT  
OF JUSTICE, OFFICE OF THE  
ATTORNEY GENERAL

By: /s/ Preeti K. Bajwa  
Preeti K. Bajwa  
*Counsel for Defendants*

Dated: April 20, 2022

FREEMAN MATHIS & GARY, LLP

By: /s/ Candice Jackson  
(as authorized on April 20, 2022)  
Candice Jackson  
*Counsel for Plaintiffs*

1 Dated: April 20, 2022

O'MELVENY & MYERS LLP

2  
3 By: /s/ Dimitri D. Portnoi  
4 (as authorized on April 20, 2022)  
5 Dimitri D. Portnoi  
6 *Counsel for Proposed Intervenors*

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9 **ORDER**

10 The above stipulation is approved.

11 IT IS SO ORDERED.

12 Dated: **April 21, 2022**

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UNITED STATES DISTRICT JUDGE